

January 25, 2002

MEMORANDUM TO: A. Louise Lund, Chief
Component Integrity & Chemical Engineering Section
Materials and Chemical Engineering Branch
Division of Engineering

FROM: Maitri Banerjee */RA by Anthony J. Mendiola for/*
Lead Project Manager
Steam Generator Action Plan
Division of Licensing Project Management

SUBJECT: SUMMARY OF NOVEMBER 28, 2001, MANAGEMENT MEETING WITH
THE NUCLEAR ENERGY INSTITUTE REGARDING NEI 97-06 - OPEN
PUBLIC MEETING

On November 28, 2001, Nuclear Regulatory Commission (NRC) staff met with representatives from the Nuclear Energy Institute (NEI) and industry at the NRC's office in Rockville, Maryland for a management level meeting on industry initiative NEI 97-06. The purpose of the meeting was to agree upon a resolution path for the two major open issues before NEI submits the generic license change package (GLCP) for NRC review and approval. Also on the agenda was a discussion of the root cause and the potential generic applicability of the recent TMI Unit 1 steam generator plugged tube severance event to other pressurized water reactor (PWR) plants. Attachment 1 is a list of those attending the meeting.

Maitri Banerjee, Lead Steam Generator Project Manager, started the meeting with an introduction of the agenda and the attendees. Dr. Brian Sheron, the Associate Director for Project Licensing and Technical Analysis, NRR, in his opening remarks, indicated the need for reaching an agreement on the remaining two major issues in the near future. These issues deal with staff concerns related to the development of mutually agreed upon maximum inspection intervals and the need for appropriate regulatory control to be implemented in the new regulatory framework for future revision of steam generator inspection intervals. The staff presentation is contained in Attachment 2.

Mr. Michael Tuckman, on behalf of NEI, agreed with Dr. Sheron and outlined the steps NEI needs to go through before submitting the GLCP for NRC review. The major NEI work included resolution of over 700 industry comments and the NRC comments regarding Revision 6 of the EPRI SG examination guideline. He pointed out that many of the industry and NRC comments overlap. He agreed to work closely with NRC in the resolution of staff comments before formalizing in a written response to NRC. The industry also stated that they are considering ways to factor in NRC comments when revising EPRI SG guidelines. This comment was related to staff concerns regarding changes industry may make in the future to guidelines used to implement the performance based framework.

Dr. Sheron explained the basis for NRC's position that there needed to be a technical specification (TS) requirement for NRC approval of changes to the steam generator inspection

intervals. Mr. Tuckman indicated that once the staff and the industry agree on appropriate extended inspection intervals, the industry would accept regulatory control on the intervals via an administrative TS. NEI and NRC agreed that the administrative TS should make provision for staff approval of assessment methodologies to establish inspection intervals in lieu of specific maximum inspection intervals. Mr. Tuckman stated that NEI expected to submit the GLCP for NRC approval by about the middle of 2002. With submittal of an acceptable GLCP, the staff stated that it expected to be able to issue a draft safety evaluation on the revised regulatory framework for public comment within a couple of months thereafter.

The NEI presentation then focused on the TMI severed tube issue. At TMI two plugged tubes severed. These tubes are in regions affected by high cross flow velocities. NRC Information Notice (IN) 2002-02 contains a detail discussion of this incident. The industry is currently assessing the results of inspections discussed in the IN and other operational experience to determine needed actions. The NEI Technical Advisory Group is expected to meet during the week of December 10, 2001 to review the inspection results and determine recommended actions and a schedule for these actions. NEI plans to meet with the NRC after this determination is completed. The handouts containing the NEI presentation slides are provided as Attachment 3.

Dr. Sheron noted the need for a justification of continued operation for PWR plants unless the issue could be clearly established as a TMI specific issue. In response, Mr Alex Marion of NEI indicated that the industry could prepare a general risk argument as part of such justification. Mr. Marion also indicated it would respond to the NRC request for technical meetings on this subject by mid December to address this issue.

Attachments: As stated

cc: Jim Riley, NEI

intervals. Mr. Tuckman indicated that once the staff and the industry agree on appropriate extended inspection intervals, the industry would accept regulatory control on the intervals via an administrative TS. NEI and NRC agreed that the administrative TS should make provision for staff approval of assessment methodologies to establish inspection intervals in lieu of specific maximum inspection intervals. Mr. Tuckman stated that NEI expected to submit the GLCP for NRC approval by about the middle of 2002. With submittal of an acceptable GLCP, the staff stated that it expected to be able to issue a draft safety evaluation on the revised regulatory framework for public comment within a couple of months thereafter.

The NEI presentation then focused on the TMI severed tube issue. At TMI two plugged tubes severed. These tubes are in regions affected by high cross flow velocities. NRC Information Notice (IN) 2002-02 contains a detail discussion of this incident. The industry is currently assessing the results of inspections discussed in the IN and other operational experience to determine needed actions. The NEI Technical Advisory Group is expected to meet during the week of December 10, 2001 to review the inspection results and determine recommended actions and a schedule for these actions. NEI plans to meet with the NRC after this determination is completed. The handouts containing the NEI presentation slides are provided as Attachment 3.

Dr. Sheron noted the need for a justification of continued operation for PWR plants unless the issue could be clearly established as a TMI specific issue. In response, Mr Alex Marion of NEI indicated that the industry could prepare a general risk argument as part of such justification. Mr. Marion also indicated it would respond to the NRC request for technical meetings on this subject by mid December to address this issue.

Attachments: As stated

cc: Jim Riley, NEI

Distribution: EMCB R/F JBirmingham WBeckner ESullivan
 BBateman P Wen AMendiola SBajwa
 KKarwoski SG Service List Office EMCB:DE SC:EMCB

ADAMS Accession Number: ML020070240

| | | | |
|--------|-----------|---------|-----------|
| OFFICE | PM:LPD3-2 | DE:EMCB | SC:LPD3-2 |
| NAME | MBanerjee | LLund | AMendiola |
| DATE | 1/17/02 | 1/17/02 | 1/23/02 |

OFFICIAL RECORD COPY